## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

	Х	
	:	
In re:	:	
	:	
THE FINANCIAL OVERSIGHT AND	:	PROMESA
MANAGEMENT BOARD FOR PUERTO RICO,	:	Title III
	:	
as representative of	:	Case No. 17-BK-3283 (LTS)
	:	
THE COMMONWEALTH OF PUERTO RICO, et al.,	:	(Jointly Administered)
	:	
Debtors. <sup>1</sup>	:	
	X	

JOINT INFORMATIVE MOTION OF FINANCIAL OVERSIGHT AND MANAGEMENT BOARD, ITS SPECIAL CLAIMS COMMITTEE, AND OFFICIAL COMMITTEE OF UNSECURED CREDITORS REGARDING SUBMISSION OF FINAL REVISED STIPULATION AND AGREED ORDER BY AND AMONG FINANCIAL OVERSIGHT AND MANAGEMENT BOARD, ITS SPECIAL CLAIMS COMMITTEE, AND OFFICIAL COMMITTEE OF UNSECURED CREDITORS RELATED TO JOINT PROSECUTION OF DEBTOR CAUSES OF ACTION

To the Honorable United States District Judge Laura Taylor Swain:

The Official Committee of Unsecured Creditors of all Title III Debtors (other than COFINA) (the "Committee"), the Financial Oversight and Management Board for Puerto Rico (the "Oversight Board"), and the Special Claims Committee of the Oversight Board (the "Special Claims Committee" and, together with the Committee and Oversight Board, the "Parties"), in accordance with the Court's instructions at the omnibus hearing held on April 24, 2019 (the "Hearing"), respectfully submit the final revised stipulation and order (the "Final Revised

The Britanian submit the final revised supulation and order (the Tina

The Debtors in these title III cases, along with each Debtor's respective title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), (iv) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780) (Last Four Digits of Federal Tax ID: 3747).

Stipulation"), attached hereto as Exhibit A, in connection with the Urgent Joint Motion for Expedited Consideration of Urgent Joint Motion for Entry of Order Approving Stipulation and Agreed Order by and Among Financial Oversight and Management Board, its Special Claims Committee, and Official Committee of Unsecured Creditors Related to Joint Prosecution of Debtor Causes of Action [Docket No. 6305]. Attached hereto as Exhibit B is a blackline of the Final Revised Stipulation marked against the version that was filed as Exhibit A to the Omnibus Reply of Official Committee of Unsecured Creditors in Support of Motion for Approval of Stipulation and Agreed Order by and Among Financial Oversight and Management Board, its Special Claims Committee, and Official Committee of Unsecured Creditors Related to Joint Prosecution of Debtor Causes of Action [Docket No. 6381].

1. The Final Revised Stipulation is the version approved by the Court at the Hearing and reflects the changes presented to the Court at the Hearing. The Parties respectfully request that the Court so-order and enter the Final Revised Stipulation.

[Remainder of page intentionally left blank.]

Dated: April 25, 2019 /s/ Luc A. Despins

PAUL HASTINGS LLP

Luc. A. Despins, Esq. (*Pro Hac Vice*)
James R. Bliss, Esq. (*Pro Hac Vice*)
James B. Worthington, Esq. (*Pro Hac Vice*)
G. Alexander Bongartz, Esq. (*Pro Hac Vice*)
200 Park Avenue
New York, New York 10166
Telephone: (212) 318-6000
lucdespins@paulhastings.com
jamesbliss@paulhastings.com
jamesworthington@paulhastings.com
alexbongartz@paulhastings.com

Counsel to the Official Committee of Unsecured Creditors

- and -

/s/ Juan J. Casillas Ayala

CASILLAS, SANTIAGO & TORRES LLC

Juan J. Casillas Ayala, Esq., USDC - PR 218312 Diana M. Batlle-Barasorda, Esq., USDC - PR 213103 Alberto J. E. Añeses Negrón, Esq., USDC - PR 302710 Ericka C. Montull-Novoa, Esq., USDC - PR 230601 El Caribe Office Building

El Caribe Office Building 53 Palmeras Street, Ste. 1601 San Juan, Puerto Rico 00901-2419

Telephone: (787) 523-3434

jcasillas@cstlawpr.com dbatlle@cstlawpr.com aaneses@cstlawpr.com emontull@cstlawpr.com

Local Counsel to the Official Committee of Unsecured Creditors

By: <u>/s/ Brian S. Rosen</u>

Martin J. Bienenstock Brian S. Rosen Jeffrey W. Levitan (*Pro Hac Vice*)

PROSKAUER ROSE LLP

Eleven Times Square New York, NY 10036 Tel: (212) 969-3000

Fax: (212) 969-2900

Attorneys for the Financial Oversight and Management Board for Puerto Rico as representative for the Debtors By: /s/ Sunni P. Beville

## **BROWN RUDNICK LLP**

Edward S. Weisfelner, Esq. (*Pro Hac Vice*) Angela M. Papalaskaris, Esq. (*Pro Hac Vice*) Seven Times Square
New York, NY 10036
Tel: (212) 209-4800
eweisfelner@brownrudnick.com
apapalaskaris@brownrudnick.com
jweddle@brownrudnick.com

Stephen A. Best, Esq. (*Pro Hac Vice*) 601 Thirteenth Street NW, Suite 600 Washington, D.C. 20005 sbest@brownrudnick.com

Sunni P. Beville, Esq. (*Pro Hac Vice*) One Financial Center Boston, MA 02111 Tel: (617) 856-8200 sbeville@brownrudnick.com

Counsel to the Special Claims Committee

And

ESTRELLA, LLC Alberto Estrella (USDC-PR 209804) Kenneth C. Suria (USDC-PR 213302) P. O. Box 9023596 San Juan, Puerto Rico 00902–3596

Tel.: (787) 977-5050 Fax: (787) 977-5090

Local Counsel to the Special Claims Committee